

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS

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KATIE MILILLO, IRENE JOHNSON	)	
JANINE HELLER and TOMAYITA	)	
STEVENSON,	)	
Plaintiffs,	)	
v.	)	CIVIL ACTION NO. 04-30130-MAP
WHITMAN EDUCATION GROUP,	)	
INC., CAREER EDUCATION	)	
CORPORATION, ULTRASOUND	)	
DIAGNOSTIC SCHOOL and	)	
LOUIS GIANNELLI,	)	
Defendants.	)	
	)	

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**DEFENDANT LOUIS GIANNELLI'S MOTION TO EXTEND THE TIME TO  
PRODUCE FINANCIAL DOCUMENTS AS REQUIRED BY COURT ORDER**

Defendant Louis Giannelli hereby submits this Motion to extend the time to produce financial documents as required by the Court's November 4, 2005 Order. Pursuant to the Order, Mr. Giannelli is to produce by November 18, 2005, financial documents including but not limited to bank statements, stock information, mutual fund information, and appraisals of all property owned. The information requested spans from 2000 to the present. It also involves information concerning property jointly owned with other individuals. It is not all readily accessible to Mr. Giannelli. While Mr. Giannelli has undertaken a diligent search, he requires additional time to complete the search and to produce the documents in question. Thus, Mr. Giannelli respectfully requests that the deadline for producing this information be extended until

November 30, 2005. Counsel for the Plaintiffs has assented to the additional time to produce the documents.

Respectfully submitted,

**LOUIS GIANNELLI**

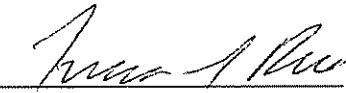
By his attorneys,

  
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Dated: November 17, 2005

**Rule 7.1 Conference**

On November 16, 2005, I communicated to Suzanne Garrow Mr. Giannelli's request for additional time to produce the financial documents responsive to the Court's Order. On November 17, 2005, Ms. Garrow told me that the Plaintiffs would assent to the requested extension.

  
Tricia A. Rice